

DOCKET FILE COPY ORIGINAL  
**DELAVAN TELEPHONE COMPANY**

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P.O. Box 128  
Delavan, MN 56023-0128

E. Ronald Parish, Manager

507-854-3221

September 10, 2008

Received & Inspected

SEP 17 2008

FCC Mail Room

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TW-A306  
Washington, DC 204554

RE: Certification of Support for Rural and Non-Rural High-Cost Carriers Pursuant to  
47 C.F.R. Sections 54.313-314, CC Docket Nos. 96-45 and 00-256

To the Filing Representative:

The Public Utility Commission (PUC)/Public Service Commission (PSC)/Utility Board/Corporation Commission of Minnesota hereby certifies that all federal high-cost support provided to rural and non-rural carriers in this state will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with section 254 (e) of the Communications Act of 1934, as amended. This includes High Cost Loop (HCL) support, Local Switching Support (LSS), High Cost Model (HCM) support, and high cost support received pursuant to the purchase of exchanges.

Attached are lists of rural and non-rural carriers certified by the Minnesota PUC/PSC Utility Board/Corporation Commission pursuant to sections 54.313 and 54.314 of the FCC's rules (47 C.F.R. – 54.313, 54.314), which require states to establish an annual certification process for rural and non-rural carriers receiving federal high cost support. As requested by the Universal Service Administrative Company, listed beside Delavan Telephone Company is its assigned study area code (SAC).

Sincerely,

E. Ronald Parish  
Manager  
Enc. 2

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**BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION**

**REQUEST FOR CERTIFICATION**

Delavan Telephone Company is seeking certification of eligibility from the Minnesota Public Utilities Commission (the "Commission") in order to be eligible for support from the federal Universal Service Fund.

The certification required for rural carriers to receive federal universal service support for all four quarters during calendar year 2009 is currently due to be filed with the Federal Communications Commission ("FCC") and the Universal Service Administrative Company ("USAC") on or before October 1, 2008. The certification may be presented to these entities in the form of a letter from the State Commission. The letter must identify which carriers in the State are eligible to receive federal support during the 12-month period and must certify that the carriers listed will only use the support for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

Delavan Telephone Company is a rural incumbent telephone company that has previously been designated by this Commission as an eligible telecommunications carrier. The Company provides local exchange telephone services, including all of the essential services that are included in the federal definition of universal service, to approximately 200 access lines within its established rural service area in Minnesota.

Based on the information in this filing, Delavan Telephone Company requests that the Commission make the appropriate certification to the FCC and USAC.

Exhibit A provides details as to the expenditures that were incurred by Delavan Telephone Company in 2007 and estimates of the expenditures for years 2008 and 2009 for the

provision, maintenance, and upgrading of facilities and services supported by federal universal service. Consistent with the universal service principles set forth in the federal law and also the FCC orders, Delavan Telephone Company will use federal universal support amounts received in 2008 to offset a portion of 2008 expenditures incurred as shown in Exhibit A. This use of federal universal service support will enable Delavan Telephone Company to: (1) maintain rates for its local exchange services that are affordable and reasonably comparable to rates being charged for the same services in urban areas; and (2) to continue to upgrade its telecommunications facilities and equipment as necessary to meet evolving service requirements and maintain high quality service. Specific projects are listed on Attachment 1. The use of federal universal service support for these purposes is clearly consistent with the federal universal service principles.

In Docket P-999/M-05-741 the Commission ordered carriers seeking annual certification for universal service support to comply with the annual filing requirements adopted by the FCC in CC Docket 96-45, FCC 05-46 with the modifications that: (i) a report on a two-year service quality improvement plan is to be used instead of a five year plan; and (ii) information may be filed on a service area basis instead of a wire-center basis. The following information is provided in compliance with this requirement.

Delavan Telephone Company's service quality improvement plan is to continue to upgrade its telecommunications facilities and equipment as necessary to meet evolving service requirements and maintain high quality service throughout Delavan Telephone Company's service area. As an incumbent local carrier Delavan Telephone Company upgrades and replaces facilities and equipment as necessary.

Delavan Telephone Company has not provided maps as no changes to our service areas have been made during the current year. The existing maps are on file with the Department of Commerce and the Department of Administration.

Additional information required is provided as follows:

- During the year of 2007 there were no outages that required reporting to the FCC.
- Delavan Telephone Company was able to provide service to all potential customers that requested service during 2007 and at December 31, 2007, we had no unfulfilled requests for service.
- The number of complaints of service quality per 1,000 handsets or lines per month for 2007 is estimated at less than 1.
- The attached affidavit contains the required certifications as they pertain to an incumbent local exchange carrier.
- Attachment 1 is a listing of the largest projects for the next two years.

Based on the foregoing information, the enclosed Exhibit A and the enclosed Affidavit, Delavan Telephone Company requests that this Commission issue an appropriate certification to the FCC and USAC indicating that Delavan Telephone Company is in compliance with 47 U.S.C. § 254(e) and should receive all federal universal service support determined for distribution to the Company in 2009.

**AFFIDAVIT**

STATE OF MINNESOTA                   )  
  )ss.  
COUNTY OF FARIBAULT               )

1. My name is E. Ronald Parish. I am employed by Delavan Telephone Company ("Company") as its Manager. I am an officer of the Company and am authorized to give this affidavit on behalf of the Company. This affidavit is provided to support the request of the Company for certification by the Minnesota Public Utilities Commission as contemplated in 47 C.F.R. § 54.314.

2. During the year 2007, the Company received federal universal service support as shown on Exhibit 1 to this Affidavit and had investments and expense relating to the provision, maintenance and upgrading of facilities and services for which such support was intended as also shown on Exhibit 1. During the year 2007, the Company used the federal universal service support it received only for the provision, maintenance and upgrading of facilities and services for which the support is intended.

3. The Company hereby also certifies that it will only use the federal high-cost support it receives during 2009 for the provision, maintenance and upgrading of facilities and services for which such support is intended.

4. The Company also certifies that it is compliant with applicable rules on service quality and service provision in emergency situations, and that we do provide equal access to long distance carriers.

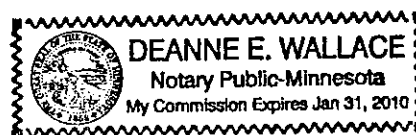
FURTHER AFFIANT SAYETH NOT.

E. Ronald Parish  
MGR/PRES

STATE OF MINNESOTA                   )  
  )ss.  
COUNTY OF Faribault               )

Subscribed and sworn to before me this 29 day of May - 2008

Deanne E. Wallace  
Notary Public



**Non-Public Document – Contains Trade Secret Data****Largest Five Projects Projected for 2008 and 2009**

Listed below are the five largest projects currently projected to be worked on during 2008 and 2009.

1. Replace bad cable - \$4,000
2. Line expansions - \$2,000
3. Upgrade electronic equipment - \$3,000
4. Purchase COE batteries - \$12,000
5. Pedestal maintenance - \$2,000

**Compliance Progress Report on the Largest Five Projects Projected for 2007 and 2008**

Listed below are the five largest projects that were projected to be worked on during 2007 and 2008, and the status of each project as of May 1, 2008.

	<u>Percent Complete</u>
1. Replace bad cable - \$4,000	100%
2. Line expansions - \$2,000	100%
3. Upgrade electronic equipment - \$2,000	100%
4. Purchase COE batteries - \$4,000 (postponed till 2008)	0%
5. Pedestal maintenance - \$1,500	100%

USF Certification for 2008  
Attachment to Affidavit  
Delavan Telephone Company

Exhibit A

**Year 2007 Federal Universal Service Receipts Subject To Certification**

High Cost Loop Support	\$60,462
ICLS Support	na
Safety Net Additive	na
Local Switching Support	\$26,064
<b>TOTAL</b>	<u>\$86,526</u>

**Expenditures For Provision, Maintenance, and Upgrading Of Facilities and Services Supported By Federal Universal Service Funding**

	<u>Actual</u> 2007	<u>Estimated</u> 2008	<u>2009</u>
<b>Plant Specific Operations Expenses</b>			
Network support (Accts. 6110-16)	\$0	\$0	\$0
General support (Accts. 6120-24)	\$5,607	\$6,000	\$6,000
Central office switching (Accts. 6210-6212.2)	\$12,678	\$14,000	\$15,000
Cable and wire facilities (Accts. 6410-6441)	\$14,320	\$16,000	\$16,000
Network operations (Accts. 6530-35)	\$1,946	\$2,000	\$2,000
Depreciation and amortization (Accts. 6560-65)	\$4,636	\$5,000	\$5,000
<b>Customer Operations Expenses</b>			
Customer services (Accts. 6620-23)	\$143,797	\$151,000	\$159,000
<b>Corporate Operations Expenses</b>			
Executive and planning (Accts. 6710)	\$112,391	\$118,000	\$124,000
General and administrative (Accts. 6720)	\$7,263	\$8,000	\$8,000
Other corporate (not included elsewhere)	\$94,326	\$99,000	\$101,970
<b>Total Year 2007 Supported Expenses Before Return On Investment</b>	<b>\$396,964</b>	<b>\$419,000</b>	<b>\$436,970</b>
<b>Additions</b>			
Switching (Acct. 2210, Column C)	\$0	\$12,000	\$500
Cable and wire (Acct. 2410, Column C)	<u>\$0</u>	<u>\$1,000</u>	<u>\$1,000</u>
<b>TOTAL</b>	<u>\$0</u>	<u>\$13,000</u>	<u>\$1,500</u>
<b>Total Year 2007 Supported Expenditures Before Return On Investment</b>	<b>\$396,964</b>	<b>\$432,000</b>	<b>\$438,470</b>

**Exhibit 1**

**No.      Telephone Company**

1. Ace Telephone Association
2. Albany Mutual Telephone Association
3. Alliance Communications Cooperative, Inc.
4. Arrowhead Communications Corporation
5. Arvig Telephone Company
6. Barnesville Telephone Company
7. Benton Cooperative Telephone Company
8. Blackduck Telephone Company
9. Blue Earth Valley Telephone Company
10. Bridge Water Telephone Company
11. Callaway Telephone Company
12. Cannon Valley Telecom, Inc.
13. Christensen Communications Co.
14. Clara City Telephone Exchange Company
15. Clements Telephone Company
16. Consolidated Telephone Company
17. Crosslake Telephone Company
18. Delavan Telephone Company **361380**
19. Dunnell Telephone Company, Inc.
20. Eagle Valley Telephone Company
21. East Otter Tail Telephone Company
22. Easton Telephone Company
23. Eckles Telephone Company
24. Emily Cooperative Telephone Company
25. Farmers Mutual Telephone Company
26. Federated Telephone Cooperative (includes former Federated Utilities, Inc.)
27. Felton Telephone Company, Inc.
28. Garden Valley Telephone Company
29. Gardonville Cooperative Telephone Assoc.
30. Granada Telephone Company
31. Halstad Telephone Company
32. Harmony Telephone Company



**No.      Telephone Company**

33. Hills Telephone Company, Inc.
34. Home Telephone Company
35. Hutchinson Telephone Company
36. Integra Telecommunications of Minnesota, Inc.
37. Interstate Telecommunications Cooperative
38. Johnson Telephone Company
39. Kasson & Mantorville Telephone Company
40. Lakedale Telephone Company
41. Lismore Cooperative Telephone Company
42. Lonsdale Telephone Company, Inc.
43. Loretel Systems, Inc.
44. Lowry Telephone Company, Inc.
45. Mabel Cooperative Telephone Company
46. Manchester-Hartland Telephone Company
47. Melrose Telephone Company
48. Mid-State Telephone Company (includes KMP Telephone Company)
49. Midwest Telephone Company
50. Minnesota Lake Telephone Company
51. Minnesota Valley Telephone Company
52. New Ulm Telecom, Inc.
53. Northern Telephone Company
54. Osakis Telephone Company
55. Park Region Mutual Telephone Company
56. Paul Bunyan Rural Telephone Cooperative
57. The Peoples Telephone Company Of Bigfork
58. Pine Island Telephone Company
59. Polar Communications Mutual Aid Corp. (includes Polar Telecommunications, Inc.)
60. Red River Rural Telephone Association (merged with Red River Telecom, Inc.)
61. Redwood County Telephone Company
62. Rothsay Telephone Company, Inc.
63. Runestone Telephone Association
64. Sacred Heart Telephone Company
65. Sherburne County Rural Telephone Company

**No.**    **Telephone Company**

- 66.    Sleepy Eye Telephone Company
- 67.    Spring Grove Cooperative Telephone Co.
- 68.    Starbuck Telephone Company
- 69.    Twin Valley-Ulen Telephone Company
- 70.    Upsala Cooperative Telephone Association
- 71.    Valley Telephone Company
- 72.    West Central Telephone Association
- 73.    Western Telephone Company
- 74.    Wikstrom Telephone Company, Inc.
- 75.    Wilderness Valley Telephone Company
- 76.    Winnebago Cooperative Telephone Assoc.
- 77.    Winsted Telephone Company
- 78.    Winthrop Telephone Company
- 79.    Wolverton Telephone Company
- 80.    Woodstock Telephone Company
- 81.    Zumbrota Telephone Company